

### REMARKS/ARGUMENTS

The claims are 2-9 and 11. Claim 10 has been canceled and replaced by new independent claim 11 which corresponds substantially to the method claim of the counterpart Chinese application. Accordingly, claims 2-9 have been amended to depend on new claim 11. Reconsideration of the claims is expressly requested.

In an Office Action dated September 10, 2003, the Examiner stated in paragraph 4 that the applicant's argument of August 4, 2003 is incorrect, in paragraphs 6 and 7 that claims 10, 2, and 5-9 are rejected under 35 U.S.C. § 102(a) as being anticipated by *Phan* (German Patent DE 197 46 329 A1), and in paragraphs 8 and 9 that claims 3 and 4 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Phan*.

The applicant respectfully traverses the Examiner's position for the following reasons.

In order to fully consider *Phan*, the applicant has prepared an English translation of *Phan*, which is attached hereto, as Exhibit A, for consideration by the Examiner.

The applicant has thoroughly and fully considered the English translation of *Phan*, but could not find *Phan* disclosing:

(i) "the data [being] mutually shifted in position and partially [overlapping] one another" (as stated in paragraph 4, lines 3-4 of the Office Action);

(ii) "[dividing] the first, second, and third color data planes into a plurality of data groups corresponding to the dynamic pixels" (as stated in paragraph 4, lines 12-13 of the Office Action),

(iii) "[making] each data group (*dynamic pixel 18 for each static pixel*) correspond to each of the lamps in the display screen" (as stated in paragraph 4, lines 14-15 of the Office Action),

(iv) "[activating] each lamp according to a selected piece of data (*the red, the green or the blue*) contained in each data group" (as stated in paragraph 4, lines 16-17 of the Office Action), nor

(v) "a structure in which the positions of the data group of the first, second, and third colors are mutually shifted (*red, green and blue static pixels are shifted and the dynamic pixels are shifted and overlap*)" (as stated in paragraph 4, lines 20-22 of the Office Action).

Since *Phan* does not disclose the above-mentioned features of the present invention, the invention according to claims 2-10 could not be anticipated by nor obvious over *Phan*.

The applicant cannot find the above-mentioned features in *Phan*. It would be grateful if the Examiner could specifically point out where, in the English translation of *Phan*, these features can be found.

Further, from the Examiner's statement in the Office Action, the applicant thinks that the Examiner might be getting *Phan* wrong. From the statements in the Office Action such as "**each data group (dynamic pixel 18 for each static pixel)**" (paragraph 4, lines 14-15) and "**the data group of the first, second, and third colors are mutually shifted (red, green and blue static pixels are shifted and the dynamic pixels are shifted and overlap)**" (paragraph 4, lines 20-22), it seems that the Examiner is confusing the **data group** with the **dynamic pixels**.

The Applicant again attaches hereto, as Exhibit B, the color illustration that was filed on August 4, 2003.

As shown in Fig. C of the color illustration, the **dynamic pixels 18**, as well as the static pixels 17, of *Phan* are **physical pixels** made up of dots 11 on the display 10a. That is, the

dynamic pixels are not the data groups claimed in the present application.

On the other hand, the **data groups** are **logical data** for driving each dot on the display, as shown in Fig. B of the color illustration.

Accordingly, the applicant respectfully requests the Examiner to reconsider the present application.

In summary, claim 10 has been canceled and new claim 11 has been added. In view of the foregoing, withdrawal of the final rejection and allowance of this application are respectfully requested.

Respectfully submitted,  
TOYOTARO TOKIMOTO ET AL. (PCT)

COLLARD & ROE, P.C.	Allison C. Collard, Reg.No.22,532
1077 Northern Boulevard	Edward R. Freedman, Reg.No.26,048
Roslyn, New York 11576	Frederick J. Dorchak, Reg.No.29,298
(516) 365-9802	Attorneys for Applicant

FJD:jc

Enclosures: Exhibit A - English translation of Phan  
(German Patent DE 197 46 329 A1)  
Exhibit B - Color Illustration  
Copy of Petition for one-month Extension of Time

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as first class mail in an envelope addressed to: Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on December 30, 2003.

Maria Guastella